

To: Federal Communications Commission  
From: Chad Boeger, President/General Manager Union Broadcasting, Inc.  
Regarding: Comment on FCC Docket Number 07-172  
Date: January 7, 2008

To Whom It May Concern,

As President of Union Broadcasting, Inc. and General Manager of daytime-only 1510 KCTE in Kansas City, I strongly advocate using FM translators to supplement the signals of AM stations.

We have spent many hours exploring opportunities to add any kind of night signal to 1510 but there appears to be no current way to have KCTE broadcast at night. This puts us at a tremendous competitive disadvantage. Despite the fact the station has a very adequate daytime signal, we cannot program it in a traditional way because it is nearly impossible to garner consistent ratings when we must sign off as early as 5pm local time.

We feel it would be in the public interest to allow 1510 KCTE to simulcast our daytime programming and originate nighttime programming on an FM translator, ideally one that would cover a large part of the Kansas City market. We are willing to invest a significant amount of capital into, either, engineering studies to find a suitable frequency or purchasing an existing translator.

With a 24-hour signal, 1510 KCTE could program the station to a wider audience. Additionally, we would have an additional outlet for live sports broadcasts. Union Broadcasting, Inc. also owns Sports Radio 810 WHB. It is impossible to air all the live sporting events we would like to on one station. On a 1510 translator, we could air national sporting events we currently do not have a place to air as well as local events, including high schools.

Sports Radio 810 WHB airs a high school football game of the week. We would love to provide the same coverage during basketball season, but we simply do not have room in our schedule. A 1510 translator could be an outlet for such programming.

In closing, a 1510 translator would help make the station competitive in an exploding media marketplace and provide an outlet for nighttime sporting events, both local and national, that are currently not heard in Kansas City. It is the position of Union Broadcasting, Inc. that there are likely numerous other quality examples across the country of how FM translators could be used to supplement weak or non-existent nighttime AM signals. Therefore,

we strongly encourage the FCC to enact the rule proposed in Docket Number 07-172 and allow AM stations to simulcast on FM translators.

Thank you for your consideration in this matter.

Sincerely,

Chad Boeger  
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